

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

TITLE V DRAFT PERMIT NO. F-04-023

CANTON COOPERAGE, INC.

LEBANON, KY.

JULY 9, 2004

MATT KING, REVIEWER

PLANT I.D. # 021-155-00035

APPLICATION LOG # 56588

SOURCE DESCRIPTION:

Canton Cooperage produces charred wood barrels and chips for the wine industry. Various wood working equipment is used to produce barrel staves and wood chips. A natural gas boiler provides process heat. Wood is used to directly char the barrels while a natural gas rotary drum is used to toast the chips.

COMMENTS:

EQPT02, the cooperage operation, and EQPT3, oak chip production, are controlled by cyclones with 85% and 80% respectively. The rest of the source operates uncontrolled.

The emission factors for this source were obtained from AP-42 and FIRE. A barrel toasting particulate matter emission factor was determined through stack testing.

EMISSION AND OPERATING CAPS DESCRIPTION:

Canton Cooperage first applied for a conditional major permit with potential emissions of CO and VOC over the major source threshold, but it was noticed that the particulate matter emission factor supplied in the application would show a violation of 401 KAR 59:010, New process operations for unit COMB02. An hourly throughput limit was set to keep emissions below the allowable, and because this limit was set to meet a regulation not to preclude Title V, the permit was issued as a State Origin. Subsequent stack testing provided a lower emission factor and the hourly throughput limit was removed. This permit is being issued as a conditional major permit with a yearly throughput limit on the unit.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.

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